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STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL



Roy Romer  
Governor

Patricia A. Nolan, MD, MPH  
Executive Director

June 23, 1993

Mr. Richard J. Schassburger  
U.S. Department of Energy  
Rocky Flats Office, Building 116  
P.O. Box 928  
Golden, Colorado 80402-0928

RE: Industrial Area OU Integration Schedule - Operable Unit 9 (OPWL)

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced document and is providing the following comments.

The schedule supplied in the Industrial Area OU Integration does not provide for any sampling activities for Operable Unit 9. Instead, the only task outlined through January of 1994 is the ongoing Data Compilation for the OPWL by EG&G and its subcontractor(s). While the Division recognizes the need for additional data gathering to enhance characterization efforts, we feel that sufficient knowledge is available to direct non-intrusive Stage 1 sampling efforts at known OPWL components.

The Field Sampling Plan in the approved Final Phase I RFI/RI Work Plan for Operable Unit 9 is structured to allow additional data compilation activities throughout, and concurrent with, the Stage 1 investigation. The data compilation is not a necessary precursor to initiation of preliminary field work. Since the objective of the Stage 1 investigation is to characterize the nature of contamination, the Division feels that adequate information exists from the Historical Release Report and other IHSS characterizations as described in the Work Plan to initiate source sampling.

In an effort to remain consistent with the intent of the overall integration effort, the Division believes that, at a minimum, the following non-intrusive sampling activities should commence at OU9 during the same timeframe that resources for all other Industrial Area OUs are being mobilized (end FY 1993 through FY 1994):

A-BU09-000126

### Pipeline Segments

1) Sample remaining inventory, or in the case of no inventory, wipe-sample residues to characterize source materials at all locations that do not require excavation of test pits. This includes valve vaults or manholes detailed in Appendix A of the Work Plan.

2) Radiation surveys and surficial soil sampling at all sites of known or suspected surface impacts due to OPWL releases, including (but not limited to) OU9 IHSSs 123 (valve vault west of building 707), 127 (leakage west of Solar Pond 207C), 147 (leaks near Eighth Street and Central Avenue), 149 (effluent leaks north of the Solar Ponds), and 159 (multiple spills east of building 559).

### Tanks

1) Visual inspections, inventory confirmation, and residue/wipe sampling of all tanks for which excavation is not required for access (aboveground or in a building or waste pit, including sumps).

2) Surficial soil sampling underneath external connections and ancillary equipment of outside tanks.

As you are aware, per previous correspondence, the Division and EPA believe that work schedules in approved workplans are enforceable. The strategy for OU9 presented by DOE (TM preparation rather than characterization) ensures further disparity between the approved schedules and compliance with these schedules. This is unacceptable to the Division. The tasks listed in this letter for tanks and pipelines are already defined in the approved Work Plan, do not require additional data compilation, and should be well underway before the scheduled issuance of Technical Memorandum (TM) #1.

If you have any questions regarding these matters, please call Dave Norbury of my staff at 692-3415.

Sincerely,



Gary W. Baughman, Chief  
Facilities Section  
Hazardous Waste Control Program

cc: Martin Hestmark, EPA  
Bruce Thatcher, DOE  
~~Dennis Schubbe~~ EG&G  
Jackie Berardini, CDH-OE  
Dan Miller, AGO